



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

*Chem Comm - Shawnee*  
ID #: *KSD980632962*  
Break: *1.3*  
Other: *EPA*  
*12-19-88*

December 19, 1988

MEMORANDUM

SUBJECT: Proposed Sampling Activities, Chemical Commodities, Inc.,  
20201 West 55th Street, Shawnee, Kansas

FROM: ✓ Mark T. Roberts  
SINV/EP&R/ENSV *MR*

TO: Charles P. Hensley  
Chief, EP&R/ENSV

I. SITUATION

Recent EPA involvement with Chemical Commodities, Inc. (CCI) concerning the improper handling of hazardous materials during transport has warranted the scrutiny of various other CCI operations in the area. One of these operations is located in a warehouse facility in Shawnee, Kansas, which is used for the temporary storage and repackaging of chemical products. A RCRA inspection was initiated at the warehouse on December 8, 1988, following the aforementioned transportation incident. Observations made during the initial portion of the RCRA inspection established a potential for the off-site release of hazardous materials. A site reconnaissance was subsequently performed by EP&R and Ecology & Environment, Inc., Technical Assistance Team (E&E/TAT) personnel on December 9, 1988; the potential for a release was confirmed as a result of the reconnaissance. This document is provided to delineate proposed sampling actions at the CCI Shawnee facility. These actions are designed to determine whether an off-site release has occurred and, if so, to what extent.

II. SITE DESCRIPTION

The CCI Shawnee warehouse is located at 20201 West 55th Street, approximately one-half mile east of the intersection of 55th and Woodland Streets. The principal facility at this location is a 20,000 square-foot, wood-frame warehouse. RCRA inspection activities continue in this location. A pole barn, enclosed on three sides and open to the east, is located approximately

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SUPERFUND RECORDS

100 feet south of the main warehouse. This 1,500 square-foot outbuilding has been used for the storage and loading of various chemical products.

The CCI property is adjoined by agricultural land to the north, west, and south. Another commercial facility, owned by Moore Rubber Company but currently vacant, is located approximately 150 feet east of the main CCI warehouse. A north-south railroad line adjoins the Moore property on the east. Mill Creek lies approximately 3,000 feet east of the CCI property and flows one mile north to its confluence with the Kansas River. The nearest residence is located upgradient approximately one-fourth mile west of the CCI warehouse.

### III. INVESTIGATIVE HISTORY

The CCI Shawnee facility has, in the past, been the object of investigative actions undertaken by agencies at all levels of government. On January 9, 1988, a joint inspection was conducted at the site by EPA, the Kansas Department of Health and Environment (KDHE), and the Shawnee Fire Department. The KDHE report which followed this inspection cited numerous observations indicating improper storage of hazardous chemicals and deferred enforcement action to the Shawnee Fire Department. Specific clean-up actions were mandated in an order issued by the Shawnee Fire Department; violations of the 1979 Uniform Fire Code were referenced in this order. A final inspection was conducted by these same agencies following the cleanup.

Ongoing EPA investigative activities indicate that some of the same poor housekeeping practices cited in 1981 have created the potential for the release of hazardous materials to the surrounding environment. Storage conditions in the pole barn are of particular concern in this regard.

### IV. PROPOSED SITE ACTIVITIES

Surface soil/sediment samples and a single surface water sample are proposed to be collected to assess the potential for the off-site migration of chemical contaminants. The proposed sampling locations are based on the visual observations made by EPA and TAT personnel during reconnaissance activities on December 9. Additional information relevant to the proposed sampling scheme was obtained during on-site conversations with Jim Fisher, KDHE.

In general, the surface water runoff from the CCI property is easterly toward a drainage ditch which parallels the aforementioned railroad line. Mr. Fisher indicated that during intense rainfall, water has been observed flowing from west to east through the pole barn. Once the runoff passes through the pole barn, it enters a shallow north-south ditch which leads to

drainageway flowing east to a drain in the concrete lot of the Moore Rubber Company. This drain, in turn, discharges to the ditch alongside the railroad tracks (figure 1).

In order to characterize off-site contaminant migration, four surface soil/sediment samples will be collected. A background sample will be collected from an upgradient location south of the warehouse and west of the pole barn. Two additional samples will be collected from the drainageways as indicated in figure 1. A final soil/sediment sample will be collected downgradient of the the confluence of the two drainageways and will serve to document the off-site presence of contaminants associated with the CCI operation. Each of the four samples will be composed of multiple aliquots and shall be representative of specific segments of the target drainageways. The aliquots for each sample will be homogenized and placed in 8-ounce glass jars for delivery to the EPA Region VII laboratory. Disposable sampling equipment (aluminum pie pans and stainless-steel spoons) will be used in order to eliminate the potential for cross-contamination.

In addition to the four soil/sediment samples, one surface water sample will be collected from the pooled water in the ditch east of the pole barn. The sample will be collected directly into an 80-ounce amber glass jug.

A single field blank (aqueous media) and one field duplicate (soil/sediment media) will be collected and submitted for quality control purposes.

The requested analyses for all samples shall include pesticides, metals, and anion content. An inventory of materials currently stored in the pole barn will be provided to laboratory personnel to aid in the identification of analytical targets.

Due to a lack of visible staining or other evidence of gross contamination in the drainage pathways to be sampled, it is proposed that sampling activities be conducted in level D protective clothing. Disposable latex gloves will be added to eliminate the potential for contact with potential contaminants.

The proposed sampling activities are tentatively scheduled to be performed on December 15, 1988.

In addition to the soil/sediment samples, a single surface water sample will be collected from the pooled water in the ditch east of the pole barn.

Attachment

**CHEMICAL COMMODITIES, INC.**  
**SHAWNEE, KANSAS**

**66th STREET**



**WOODLAND**

**Chemical Commodities, Inc.**

**Main Warehouse**

**Gravel Lot**

**Moore Rubber Company**

**Concrete Lot**

**Drain**

**Railroad**

**Pole Barn**

- Surface Drainage Pathway
- △ Soil/Sediment Sample Location
- ⊕ Surface Water Sample Location

**Not to Scale**

Roberts  
EP&R

REGION VII ANALYTICAL SERVICES REQUEST FORM

Activity Number PK269 Date 12/14/88  
Activity Description CHEMICAL COMMUNITIES, INC. SHAWNEE KS  
Originator MARK ROBERTS EP&R Division/Branch ENSV/EP&R  
Projected Sample Delivery Date 12/16/88

REQUEST SUMMARY

No. of Samples

6

Matrix

SOIL/SEDIMENT

Analyses Type

PESTICIDES  
METALS  
ANION SCAN

2

WATER

PESTICIDES  
METALS  
ANION SCAN

SPECIAL REQUIREMENTS OR COMMENTS

PRIORITY II (EXCEPT FOR DOMESTIC SAMPLES)

APPROVALS

[Signature]  
Originator (Date)  
[Signature]  
Division Director or Branch Chief (Date)

DATA REVIEW OPTIONS

- ☐ LEVEL 1 (In-depth)  
☐ LEVEL 2  
☒ LEVEL 3 (minimal)

TO BE COMPLETED BY REGION VII LABORATORY

Lab Branch Approval: \_\_\_\_\_

Lab Assignment

X Region VII  
\_\_\_\_ TAT  
\_\_\_\_ ESAT

\_\_\_\_ CLP  
\_\_\_\_ Other

Due Date

\_\_\_\_ Routine  
X Other - as soon  
as possible  
without  
loss of time

Distribution

\_\_\_\_ Originator  
\_\_\_\_ Data Coordinator  
\_\_\_\_ CLQA  
\_\_\_\_ RSCC

\_\_\_\_ MSSV  
X ANSV  
\_\_\_\_ TAT Team Leader  
\_\_\_\_ ESAT Team Leader  
\_\_\_\_ Other